		<u>Class</u>	<u>Yes</u> .	No	NZA
20.	For surface impoundment landfi or land treatment does owner/operator maintain liability coverage for sudden accidental occurrences not less than \$3,000,000 per occurrence with an annual aggregate of not lest than \$6,000,000? Rule 701(2)				
21.	For the required insurance policy(s) is each policy / amended by attachment of an endorsement on a form provided by the Director? and	-	· ·		
22.	Is insurer licensed to transact business in Michigan?		÷	Quality and the same of the sa	
Comm	ents:	we will be a second of the sec		7//	wysii wysymunia wy sie wysiania

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Region III Headquarters P.O. Box 30028, Lansing, MI 48909

March 8, 1989

Mr. Richard Hubler General Supervisor AC Spark Plug Division -GMC 1300 North Dort Highway Flint, MI 48556

AC Spark Plug Division General Motors Corp. MID 980568745

CB=0

Dear Mr. Hubler:

On March 2, 1989, staff of the Michigan Department of Natural Resources, conducted an inspection of your facility in Flint, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. Attached is a copy of the inspection report for your information.

As a result of the inspection, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

> 264.175(b)(1) The floor in the drum storage area of the Averill Avenue facility had several cracks. Secondary containment must have an impervious base, free of cracks.

We request that you respond, in writing, to this letter by March 27, 1989 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Lergy Vahovick Col Env. Quality Analyst

WASTE MANAGEMENT DIVISION

Lansing District

517-322-5104

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RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER M L D 9 9 0 5 C 3 Z K 5 (or Michigan)	Sage 1
(Mailing Address) Ho Spank plus Div-GMC Hvevill Ave Complex	£3
That MICHIGAN 4956 CITY ZIP GODE	
DATE 3 /2 /89 TIME OF INSPECTION (FROM) 2:0014 TO) /2:	300
PERSON(S) INTERVIEWED TITLE TELEPHONE	
Richard Hubley Gen Supervisor 313-257 62	<u>'57</u>
INSPECTOR(S) AGENCY/TITLE TELEPHONE	
Lever Vahovick MONR Env quality Analys 517-322	- 13ca
Primary Business of this Facility: Kuromorioe forms me	ear.
Reason for Inspection:	int
INSPECTION FORMS:	CEM
Based upon the inspection, this facility: is a non-generator/conditionally exempt small quantity generatorsmall quantity generatorgeneratortransporter	AARCID

GENERATOR APPENDIX

3	ect	io	n A	:	Scope
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Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	<u> </u>	of the second se		
	a.)	Does the generator have copies of the manifest available for review and on-site. 262.40	<u> </u>	II
	b.)	Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	30	
Comm	ents:			
				,
2.	the copi	he manifest forms examined contain following information (If so, make es of, or record information from		
		fests that do not contain the ical elements:		
	a.)	Manifest document number (Rule 304(2)(a)?	1) :
	ъ.)	The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b)		
	c.)	The name and EPA ID number of transporter. Rule 304(2)(c)	<u></u>	
	d.)	Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d)	·	II
:	e.)	The description of waste(s)(DOT shipping name, DOT hazard class, DCT identification number. Rule 304(2)(e)		II

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		للمسل لا عاصد آب		AFFENI	Violation
· • · · ·		<u>Yes</u>	ЙО	N/A	Class
f.)	The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	/	90/y	ann. ann. an	II .
g.)	Hazardous waste number describing the wastes. Rule 304(1)(g)			Will Will The Control of the Control	II
h.)	Certification as required in Rule 304(1)(h)		4	ARRESTS AND CONTROL	II
i.)	Signatures as required in Rule 304(4)			WORK-AND STREET	I
j.)	Waste minimization program/ certification				I
Comments	· · · · · · · · · · · · · · · · · · ·		,		

3. Rep	ortable exceptions. Rule 308(3), 4	0 CFR	262.4	12	
a.)	For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.			V	I
í.ď	For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				
Comments	3:		الموادية ال		
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INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979
I FACILITY

הבת התבור ביוסח ובי שונים ביו ביוחוד ביים

This Facility:
Generales Halardous Waste (Also use Generator Appendix)
Treats Hacardous Waste
Stores Hacardous Waste
Disposes of Eacardous Waste
Transports Hazardous Waste (Also use Form C)
This Facility:
Accepts wastes from off-site sources
Eandles only its own wastes
If applicable, hazardous waste is stored in the following:
Drums (Containers)
Above-ground tanks
Underground tanks
Waste piles
Lagoons
Other
Not applicable
If applicable, wastas are treated/disposed in the following (Atrach appropriate checklist)
Surface Impoundments
Waste piles
Land Treatment
Landills
Incineration/Thermal Treatment
Chemical, Physical and Biological Treatment
Above-ground tanks

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INSPECTION FORM D Part 6 Rules P.A. 64 of 1979

HATABOOUS WASTE TREATMENT STORAGE AND DISPOSAL FACILITY Applies to Those Facilities That Do Not Have an Act 64 Permit

	Ganes	al Wacility Ctandande				
	Rule	-31 Facility Standards 601, 40 CFR 255, Subpart B	Are	Иc	<u> </u>	Violatica Class
l.	noti:	equired, have the following been				
		Notified Director of receipt of hazardous waste from a foreign source? 285.12(a)	مديد مسالات مديد مسالات		<u>v</u>	II.
	b.)	Notified Director of change of owner or operator. 40 CFR Part 270. 255.12(b)			V	I.
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·····					· · · · · · · · · · · · · · · · · · ·	<u>(1) ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>
2.		eral Waste Analysis: 265.13 Has the owner or operator obtains a detailed chemical and physical analysis of the waste? 265.13(a)		460 process		I
	ъ.)	Does the owner or operator have detailed waste analysis plan on file at the facility? 285.13(b)			MIRELE MI	I
	c.}	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off site? 255.13(c)				ī
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	a.)	24-hour	surreilla	nce? 255.	14(5)(1)	<u> </u>			7	
	Ď.)		lficial or und facili			<u> </u>			MARKET AND THE RESIDENCE	
		ii. Con	trolled en		14(5)(2)	(±±)			-	
	c.)	Danger 255.14(sigm(s) at c)	: entrance	:?				diamental district di	
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4.		Does to	erator ins ne owner o the facili pration, o	r operato ty for ma	r in- lfunction	ns,		-		
		discha may af	rges of ha fect human nment? 28	zardous w health o	aste tha				II	
	ъ.)	a writ	he owner of ten inspec cility? 28	ction sche	edule at				II	
•	-c.		does the spection of						·	
		and the state of	Monitorin 265.15(b)		nt?	· · · · · · · · · · · · · · · · · · ·	,	<u></u>		
		ii.	Safety an		cy	V				-
		ي ميان ميان در در ميان ميان در	Security	devices?	255.15(b)(1)_1		_	<u> </u>	
•		iv.		g and stru : (i.e. di 55.15(b)(1	.kes, pum	:PS.		en e	II	
		- Landing and the second and the sec		73						

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

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	,	Yes	No	<u>N / 7</u>	Violation Class	on
	v. Type of problems to be looked for during the inspection (e.g. leaky fitting, defection pump, etc.)?		457 constitution of the second		11	
	vi. inspection frequency (based upon the possible deteriora rate of the equipment)? 265.15(b)(4)	tion	**************************************	ФОбительников	II	
å.)	Are areas subject to spills in- spected daily when in use? 265.15(b)(4)	<u></u>	Nagara (Alexandria)	-	1.	
e.)	Does the owner or operator main tain an inspection log or summa of owner or operator inspection	. T. 7			,	
Ĩ.)	Does the inspection log contain the following information: 255.15(d)	.		-	· -	
	i. The date and time of the inspection? 285.15(d)	1	-		1	
	ii. The name of the inspector? 265.15(d)		- - -		ego ego	•
	iii. A notation of the observations made? 265.15(d)	· V				
	<pre>iv. The date and nature of any repairs or remedial action 255.15(d)</pre>	s?			ĪĪ	
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		Company of the Compan				
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c.	Description of training? 285.18(d)(3)				Political de la constantina del constantina de la constantina del constantina de la	- · ·

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6.	requires 1ncs 285.	irements :	or ignit wastes ad	able, dresse	reactives?					
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		Ì	Yag	_		Violation
		}		710	71/3	Class
2		cauired, does this facility have collowing equipment: 40 CFR 265.32				
	a.)	Internal communications or alarm systems. 40 CFR 265.32(a)	<u></u>		**************************************	4755A4404TP004TP-00757575
	b.)	Telephone or 2-way radios at the scene of operations. 40 CFR 285.32(b)	V	,	. 	Ī.
	c.)	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)	e V			<u> </u>
	d.)	Indicate the volume of water and/or foam available for fire control.	·. <u>C</u> /	74	ce>17	<u> </u>
Co:	mments:	d water on 717	E	****		
						•
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2		ting and Maintenance of Emergency ipment: 265.33	6-400-440-41	mene a come em e		
	a.)	Eas the owner or operator established testing and maintenance procedures for emergency equipment? 265.33				
	5.)	Is remergency equipment main- tained in operable condition? 255.33				
	c.)	If required, has owner or opera provided immediate access to in alams? 40CFR 285.34(a)	tor ternal			· ***
	d.)	Is there adequate aisle space for obstructed movement for personn and emergency equipment. 40 CFR 255.35.	<u> </u>			Ī.

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	, continues to the same to		. :: (CEA , LOSS) (C.) , (CEA			
4.	to ma	he owner or operator attempted ke arrangements with local rities in case of emergencies. R 265.37				
Comm	19275:					
						
		CONTINGENCY PLAN AND EMERGEN Rule 607, 40 CFR 265 S			<u> </u>	annigamen managa Persona manada kana managa PP Persona m ^{anag} a
1.		the contingency plan contain the owing information:				
	a.)	The actions facility personnel must take to comply with 255.51 and 265.56 in response to fires, explosions, or any unplanned re-		.	. •	
		lease of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPC) Plan, he needs only to amend that plan to incorporate hazardous was	5	·		
P		management provisions that are so cient to comply with the requirement of this Part (As applicable). 255.52(a)				
	b.)	make arrangements agreed to by local police departments, hospitals, contractors, and State				
•		and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 255.52(c) 255.37	V		· •	11
	c.)	Names, addresses, and phone numbers (cifice and home) of all persons qualified to act as emergency coordinator. 40 CFR			· · ·	II
		265.52(d)	<i>V</i> .	· -	٠- رحيب	

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INSPECTION FORM D Violation Y -> = Class ЙC 11/7 A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its T capabilities. 40 CTR 285.82(e) An evacuation plan for facility personnel where there is a possi--bility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation II routes.) 40 CFR 285.52(f) Is the facility emergency coordinf.) 11 ator identified. 40 CFR 265.55 Is coordinator familiar with all aspects of site operation and ΙΞ emergency procedures. 40 CFR 255.55 Does the Emergency Coordinator have the authority to carry out the Contigency Plan. II 40 CFR 285.55 .i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 255.56. j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinaters, changes in emergency equipment. 40 CFR 285.54 Comments:

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INSEECTION EOEM D

		Yes No	<u> </u>	7iclatica. <u>Class</u>	_ `
plan enera	copies of the contingency available at site and local gency organizations. 40 CFR 53(a) 254.53(b)	<u> </u>		ĨĪ.	
Comments:		L a			
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	USE OF MANIFEST SYS Rule 601(2)(b)	A			
wast	this facility receive hazardous se accompanied by a manifest. If complete the following:	570re	- only	Then Te	
a.)	Are copies signed and dated.	ouna	w a 51	Ī	
	Rule 608(1)(a)	emidentifications) summ			
b.)	Are significant discrepancies noted on the manifest. Rule 608(1)(b)				
c.)	Are transporters given 1 copy of the signed manifst. Rule 608(1)(c)			***	
d.)	Are copies sent to the generator within 30 days. Rule 608(1)(d)	- - -	······································	466 460	
e.)	Are copies of the manifest retained for 3 years.			**************************************	
f.)	Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608 (1)(f)	;		II	
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To it is a river to the children with more thanks

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INSPECTION FORM D

	·	Yes	No		clation Class
ъ.)	The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 255.73(b)(2)				I -
:	If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)		dillinary second	- ·	II ———
d.)	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 253.73(b)(3)		-	,	I:-
	Reports detailing all incidents that required implementation of the Contingency Plan? 255.73(b)(4)				
f.)	Records and results of inspections as required in 40 CFR 284.15(d) 285.73(b)(5)	•	·		II
g.)	If recuired, monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)		- مدين 		
h.)	Closure and post closure cost estimates. 265.73(b)(7)		· «Web-etc	ubecookki) s <u>uusestaas</u> vasivas	\$ 40 H
Comments		,		ENGLS .	
				This date and the second of th	
and	all required records available maintained for at least 3 years74(3)			•	

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INSECTION FORM D

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iomme	nts:		4	and the second s			, Xi-magi gi-gi-yi-i-ma -ma-ma-
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				سيالك والمراجعة والم			
	₩.		בבבספדיות				
Ĩ •	a bien: adminis	e owner or operatorial report to the stration by March ed years? 288.78	required	1			II
Comm	ents: ,					•	- -
			and the state of t			·	######################################
2.	receiv	<u>licable</u> , for TSD's e hazardous waste ources. Rule 265.	from off-				1
	ī. E	as the facility actardous waste from the subject subject sithout a manifest paper?	om an off-site to Rule 205		· ·	· · · · · · · · · · · · · · · · · · ·	I
	·	if "a" is yes, pro of the source of t scription of the q date received for hazarous waste shi	he waste and a uantity, type, each unmanifes	de- and	-		I
		Druns/Ro	Veexog gio-Tic	CONTAIN Gordola	<u>TEES</u>		
1.	sd el eddoo	cardous waste acci iners? If no, sk	mulated in in to tank sec	~ • ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	<u>.</u>	: 	N/A
. 2.		Is each container with accumulation hazardous waste m	date and				Ī

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		Yog	No		Violation Cliss
ъ.)	Has more than 90 days elapsed sinc date marked (Operaing license need as required in Part 5 of Rules) If yes, how many drums Accumulation dates				7
c.)	Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many	V		, ·	I
ċ.)	Are containers in good condition Rule 308(1)(a), 40 CFR 285.171. If no, specifically what is their conditions.	1	منايد حسسارين و	, and the second second	I
e.)	Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain			· •	I -
	Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many	<u>'</u>			I
g.)	Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain				I
h.)	Are containers inspected weekly for leaks and defects? Rule 306 (a) 40 CFR 255.174.	(1) <u>/</u>		magatili aggalindangang	<u> </u>
i.)	Are ignitable and reactive waste stored at least 15 meters (50 Fe from property line? (Indicate i waste is ignitable or reactive) Rule 305(1)(a) 40 CFR 255.176. no, explain	ez) ≟		anguista quantum de suince	I
j.)	Are uncompatible wastes stored i separate containers (If not the visions of 40 CFR 285.17(b) appl Rule 308(1)(a) 40 CFR 285.176. no, explain	pro-			I

÷.		No.			**
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)	•	Vae	<u>No</u>	N/3	Violation <u>Class</u>
~ ~ m m .		Are containers of uncompatible was separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 285.177.			· · ·	<u> </u>
						* .
3.	hacas	toring free liquid, does rdous waste storage area include: 306(1)(a) 40 CFR 284.175.			٠	
	a.)	Impervious base free of cracks. 40 CFR 254.175(b)(1)		V	/	I
	b.)	Containment capable of holding 10% of volume of containers or 10% of largest container which-vever is greater.			an every green and an every gree	<u></u>
Соши	ents:				***************************************	,
					, , , , , , , , , , , , , , , , , , , 	
**************************************	-			· · · · · · · · · · · · · · · · · · ·	A SAMONAMINA SAN	
4.		pazardous waste being accumulated a point of generation, Rule 308(2)				A/K
	II y		·			
	a.)	Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)	<u>«</u>	see <u></u>		I
	b.)	Is container under control or operator and near point of generation and under control of operator? Rule 306(2)				I
	c.)	Are containers in good condition? Rule 306(2) 40 CFR 255.171	. (11111111111111111111111111111111111			

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INSPECTION FORM D Violation <u>Class</u> d.) Are containers compatible with waste in them? Rule 306(2) I 40 CFR 265.172 e.) Are containers stored closed when not in use and managed to prevent <u>.</u> leaks? Rule 306(2 40 CFR 265.173 f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the I contents) Rule 306(2) Comments: TANKS Is hazardous waste accumulated in tanks? If no, skip to c. Is each tank labeled or marked with the words "Hazardous Waste", I Rule 306(1)(a), 40 CFR 252.34(a) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 I CFR 252.192(b). Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. I Rule 306(1)(a), 40 CFR 265.192(c)? d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), I 40 CER 255.192(d). **e**.) Are required daily and weekly inspections done? Rule 306(1)(a), II 40 CFR 255.194?

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		13227	NOLLO.	1 12 mm 200 mm 2	v Violation
	, w	Y 25	No	$\overline{N \setminus 7}$	<u>Class</u>
4 .)	Are reactive and ignitable wastes tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 281.21 or 251.23 Rule 306(1)(a), 40 CFR 255.199				
g.)	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.		en e		I
h.)	Eas the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)	-			I
	Tank capacity:	_ gal	lons		•
	Tank diameter:	fee	t		
	Distance of tank from property 1	ine _		·	ieet.
Comments	(See tables 2-1 through 206 of N Combustible Liquids Code - 1977 :				
tai	above ground tanks have a 150% con	ಚತ			
	serial, or if tanks hold incompatib	re	•		*

enclosed?

Rule 615(3)

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• 7			Yes	<u>Ио</u>		Violation <u>Class</u>
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	SOUND TO SOU				000000	
3.		where and operators of underground so do all the following:	AND PROPERTY AND	<u> </u>		·
	a.)	Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)	•	-		I
÷	b.)	Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)				I
	c.)	Conduct leachate sampling at least once a year. Rule 615 (4)(c)				
	d.)	Maintain an accurate inventory of the tank. Rule 615(4)(d)		-		I
Comm	ents	•	• `			
				, 1924 M		
4.		hazardous waste accumulated in		, 190 7-2		
		er than tanks or containers? yes, explain	<u></u>	<u> </u>		N/A
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6						•
Com				Harris Marks	W.O.	

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CLOSURE AND POST CLOSURE (Part 265 Subpart G) Part 7 of Act 64 Rules |

		. "		•	nd		Yes	Йo		Violation <u>Class</u>
l.	Closu	ire 253	5.112							
•	a.)			ity clos r inspec		an.	V	Address Transport	all to the second se	_
	b.)	Does '	the pla	n ident:	iiy					
		<u>.</u>		n exten facili				-	-	1
		ii.	maximu invent	m hasar ory?	dous w	aste	V	West There the	- 452	I .
		<u> </u>	estima	ited yea	roic	losure		ologica Characteristica	· · · · · · · · · · · · · · · · · · ·	
~		iv.	sched	ile of c	losure	activit	ies_ <u>/</u>		-	· , whospers, francis and functions which
Comm	ents:	**************************************				~~~~ <u>~</u>	·			
	. •		· .						_	
									. •	
* 2.	Post	t-Clos	ire 265	.118 - 2	Act 64	Rules				
	a.)			-closur: or_insp		· · · · · · · · · · · · · · · · · · ·	arm trans			Ī
	b.)	Does	this p	lan con	tain:					
		1.	_mccit	iption oring a encies?	ctivit:	indwater ies and	aga Pililiana a Pililiana	-		I managamentana
		ii.				ntenance quencies				
	٠	·	AA.		or con res, w	cap. fir tainment here		gjilanan 40		1
			EB.	dacilid equipm		toring	************************************	and wipedown		

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		. ^		<u>Yes</u>	No	<u> </u>	iolation Class
		iii.	name, address, and phone number of person or office to contact during post- closure care period?	***************************************			<u> </u>
	c.)	Eas beg	the post-closure period un?	- Constanting	424 - romanno	***************************************	N/A
	d.)	ÇOS	the written post-closure t estimate available? .144	Commence:		***************************************	I
omm	ents	•				otifica-	
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^{*} Applies only to disposal facilities.

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A.

		he waste anal ements [264.1	lysis plan cover 1 3 or 265.13]?	Part 268		• •
	o F-sc	olvent	Yes	No	NA	
	o Cal	ifornia List	Yes	No	NA	
	o Fir	st Third	Yes	No	NA	
2.		the facility o s and residue		tive chemical ar	ad physical analyses of	
			Yes	No		
	a.	What date w	as the waste ana	lysis plan last r	evised? <u>1995</u>	
			conducted on-si			
		, -			te Off-site	
	-					
	-	Tdomestr off	Soite John : Rus		chusen 1	
		Identify off	-site lab: Bu-	rma Te	churca!	
	c.		-site lab: <u>Bo</u>		churca!	
	:		waste analyzed			
	:	Is F-solvent Is First Thi appropriate constituent	waste analyzed Yes Ird waste analyze for the objectiv	using TCLP? No ed using the and e of the specific		
	: C.	Is F-solvent Is First Thi appropriate constituent	waste analyzed Yes ird waste analyze for the objective analysis for des	using TCLP? No ed using the and e of the specific	NA alytical method that is led BDAT (i.e., total	
	: C.	Is F-solvent Is First Thi appropriate constituent stabilizatio Note:	waste analyzed Yes Ird waste analyze for the objective analysis for des n/fixation techn Yes The appropriate	using TCLP? No ed using the and e of the specific truction techno ologies)? No analytical metholics third wast	NA alytical method that is led BDAT (i.e., total logies and TCLP for NA nods (TCLP or total les with specified treats	T 222. 22.

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	3.	Are the operating records, including analyses and quantities, complete [264.73/265.73]?
		Yes No
B.	C+	(268.50)
ь.	<u> 310r</u> -	age (268.50)
·	1.	Are restricted wastes stored on-site?
		Yes No
	:	If no, go to C, Treatment.
	2.	If yes, check the appropriate method.
		Tanks Containers
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
		Yes No NA
٠.	•	
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
	-	Yes No
	5.	Do operating records agree with container labeling?
,		Yes No NA
	6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?
		YesNo N/A
	•	

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7.	Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?	•
	Yes No NA	
•	If yes, can the facility show that such accumulation is necessary to facilitate proper-recovery, treatment, or disposal? Yes No	
	If yes, state how:	
,.		
8.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?	
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?	
	Yes No	v
9.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating	
	record? Yes No NA	٠.
C. <u>Tr</u>	eatment MA	-
1.	Does the facility treat restricted wastes other than in surface impoundments? Yes No	·
٠	If no, go to D, Treatment in Surface Impoundments. II i	

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analysis plan, dete (for treatment sta	in accordance with ermine whether the ndards expressed as m all treatment prods [268.7(b)]?	residue or r	esidue e: lons in th		·	
	Yes	No				
Is dilution used a	s a substitute for tr	eatment?	No 7	YeaT.	menT	at
	s a substitute for tr	No		This	faci.	174
	, demonstration, and red by the generate?			:y's		
	Yes	No				
Does the facility treatment standa	ship any waste or rds to an off-site d	treatment re isposal facil	esidue th	nt meets	the	
		_				
<u>.</u>	ZS Y es	No No		NA	•	<u>-</u>
If yes, does the	treatment facility p	rovide notif		· ·		
If yes, does the	treatment facility p	rovide noti: ?	fication a	· ·		
If yes, does the certification to	treatment facility p the disposal facility	rovide notif ? No	Cication a	· ·		
If yes, does the certification to the second	treatment facility p the disposal facility Yes	rovide notif?No	Cication a	and	No	
If yes, does the recertification to the second of the seco	treatment facility p the disposal facility Yes fication contain the	rovide notif? No c following? (s)	ication a	and		
If yes, does the recertification to the second of the seco	treatment facility p the disposal facility Yes fication contain the rdous waste number	rovide notif? No c following? (s)	ication a	ind (es	No	
If yes, does the certification to the certification to the large of th	treatment facility p the disposal facility Yes fication contain the rdous waste number	rovide notif? No c following? (s)	ication a	ind (es (es	No	:

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	8.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
		Yes No NA
		If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
	-	Yes No
D.	Tre	atment in Surface Impoundments
	1.	Are restricted wastes placed in surface impoundments for treatment?
		Yes No
		If no, go to E, Land Disposal.
	2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
		Yes No
	3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit? YesNoNA
		162 140 14A
	4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
		Yes No Attach test results.
	5	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 263.41, or where no treatment to the standards are established for a waste, the applicable prohibition and the levels?
		Yes No

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		Commence of the second			Mining Collection (Collection of Collection	,- <u>-</u> -
Does	the operating re	cord adequatel	v document the	results	annual de la companya	-
	aste analyses per					
		Yes	No			
	the hazardous wo dards (268.41) or					
	Sludge	Yes	No			
	Supernatant	Yes	No			
a.	If yes, are sluct basis?	ige and superna	tant removed ac	lequately or	an annual	
		Yes	No			
b.	Are adequate do records ind		en to protect lin integrity is inst			
	± .	Yes .	No			,
c.	Are residues simpoundment		naged in anothe	er surface		٠.
•,	•	Yes	No	· ·		
đ.	Are residues	treated prior to	disposal?	•		
	ing.	Yes	No			٠.
	If yes, are w	aste residues tre	ated on-site or	off-site?		
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		On-sit	?≂11() ≘:	110		

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		TSD ,	
	- ·	N//V	,
E.	Land	Disposal	•
		Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?	- Name -
		Ycs No	
	. •	Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.	•
		If yes, specify which units and what wastes each unit has received:	
			÷
	2.	Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?	
		Yes No	
	3.	Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?	
		Yes No :	
	-		
•	4.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?	
		Yes No	
	-	If yes, at what frequency?	
	5.	land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no	
		migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?	
	•	Yes No	
			·• ····
	6.	Does the facility dispose of restricted wastes that are subject to a national capacity variance?	uzna of tara

____ No

		N.	•			
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hat is the volume of the	: restricted	d wastes dispo	sed of to date?

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February 24, 1986

Mr. Richard Hubler General Supervisor AC Spark Plug Div. of GM Averil Avenue Plant 4134 Davison Road Flint, MI 48556

> Re: MID 980568745 Averil Avenue Plant

Dear Mr. Hubler:

On February 19, 1986, staff of the Department of Natural Resources conducted an investigation of your facility located at 4134 Davison Road in Flint, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

This inspection revealed that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Enclosed is a copy of the inspection report for your information.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Leroy Vahovick

Env. Quality Analyst

Er, Jakovich

DNR - Lansing District

HWD - Region III

P.O. Box 30028

Lansing, MI 48909

LV/ms

Enclosure

cc: U.S. EPA - Region V

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in. Plumard Subject General Supervisor
V. Spark Flog Siv. of W. veril Avene Planc
ville Borteen Road
Vinc. M. ARSA

%: 4TD 480564745 Averil Averue Plant

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in Tebraary if, 1860, staff of the Department of Vatoral Resources conducted an investigation of your facility located at Alia Davison feed in Tilet, Michigan to evaluate cospilance of that facility with requirements of Subtitle C of the Resource Conservation and decovery Lot (RORA), an assended.

This isopedica revealed that your facility was in compliance with the ECRA requirements evaluated at the time of the inspection. Comvisence with these requirements does not list the applicability of other provisions of the ECRA regulations. Inclosed is a copy of the teaprot for your information.

If you have may quastions ragarding this matter, please feet free to

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V makes# - AMD . tot for

RCRA Inspection Report

		_	•
K plug Division	09 GM - A	veril Ave 1	Plant.
State: Mich	48556 1		
Time of inspection	(from) <u>12:30</u> p (ts) 3:00/P	5
Title	Telephone		
General Super	113-25/	-6257	E in
	· · ·	·	
8			8 1
Agency/Title	Tel ephone		*:
MONR Env Evality	Analyst 517-3	22-1300	
	•		
m 40 GFR 265 1 and/or		A	His.
no generation or Trans	portation)	A 1	
n		e, c	
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		С	
	State: Mich Time of inspection Title General Super Agency/Title MONR Env Frainty one box) 1 one box)	State: Mich 48556 i Time of inspection (from) 12:30p (state) Title Telephone General Supervisor 313-259 Agency/Title Telephone MONR Env General Analyst 517-3 Inspection one box) Inspection mo generation or Transportation)	State: Mich 48550 . Time of inspection (from) 12:30p (to) 3:00p Title Telephone General Supervisor 313-257-6257 Agency/Title Telephone MONR. Enc featury Analyst 517-322-1300 Inspection Form(s) Inspection Form(s) The section of transportation of the section of the sect

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Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS
 WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C,
 D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applicat	tion	process(es) (EPA Form 3510-3) In	nspect	ion Form A	section(<u>s)</u>
S01 <u></u>	V	storage in containers			Ī	
S02 <u> </u>		storage in tanks			Ĵ	
то1 <u>Т</u>		treatment in tanks			J	
S04 <u>T</u>		storage in surface impoundment			K,F	
T02 <u>T</u>		treatment in surface impoundment			K,F	
D83 <u>T</u>	I	disposal in surface impoundment			K,F	
S03 <u>T</u>	Ţ	storage in waste pile			L	
D81 <u>T</u>		disposal by land application.		•	M,F	
D80]		disposal in landfill .	·		N,F	
тоз <u>Т</u>		treatment by incineration			0/P	
Т04]		treatment in devices other than ta impoundments, or incinerators	anks, :	surface	Q	
Other activities						Ì
GENERATOR]	XÍ		j	APPENDIX	GN	
TRANSPORTER]			i.	APPENDIX	TR	

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

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		Section B: GENERAL FACILIT	Y STAN	IDARDS:	(Part	265 Subpart B)
•	-		YES	NO	NI*	Remarks
١.		the Regional Administrator n notified regarding: 265.12				
	ā.	Receipt of hazardous waste from a foreign source?	\$0000000000000000000000000000000000000	V		
	Ь.	Facility expansion?	- Constitute	V	damana, Az-	
	C•	Change of owner or operator?	& damida	V		
2.	Gen	eral Waste Analysis: 265.13				ı
	a.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		SZISSAMANANA	Q™55°e de Demonite	
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?		***************************************	d™dammanagan	
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	V	*455EEEE/coronado	hamman (1995)	•
3.	Sed	curity - Do security measures include (if applicable) 265.14	a 2			•
	a.	24-Hour surveillance?	4000000		P-sylline no money	
	b.	or i. Artificial or natural barrier around facility?		-0000	Market Sept.	
		and ii. Controlled entry?	V		talement man	
	Ċ.	Danger sign(s) at entrance?	<u>/</u>	and the second	Emmonate Street (Pr	
4.	0w	ner or operator inspections: 265.15				
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	<u> </u>		www	

		•	•
	•		

	have	s the owner or operator e an inspection schedule the facility?		pransy s
		so, does the schedule address inspection of the following ms:		
	e e	monitoring equipment?		,
	ii.	safety and emergency equipment?		~
	iii.	security devices?		
	i۷۰	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	<u> </u>	926
	V.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?		,
-	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>/</u>	<u>مانات «س</u>
		e areas subject to spills inspect- daily when in use?		
	an	es the owner or operator maintain inspection log or summary of ner or operator inspections?		
		es the inspection log contain the llowing information:		
	1 .	the date and time of the inspection?		
	jj.	the name of the inspector?		
	jii.	a notation of the observations made?		
	iv.	the date and nature of any repairs or remedial actions?		
5.	<u>.</u>	training records 265.16		
•	a. Jo	b titles?		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	b. Jo	b descriptions?		,

YES NO NI

Remarks

<u> </u>	·-	
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			162 110	14 T	Remarks
	C.	Description of training?	*27*20*20020	etheremodrophity	
,	d.	Records of training?	manipum manusiama	manna halingay	
	e.	Did facility personnel receive the required training by 5-19-81?		854402-und kandan	-
	f.	Do new personnel receive required training within six months?		Announce	· ·
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?		•	
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		. •
	а.	Special handling?		944920000Dooillita	**************************************
	b.	No smoking signs?	/	nagrangagy.	
	C.	Separation and protection from ignition sources?	<u>/</u>	Carlos and the same of the sam	•

	*	N
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Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Main of F	tenance and Opera acility: 265.3	tion l	رتت شمر د	N 1 (2)	RIT	Doma wk e
		s there any evide		YES	NU	MT .	Remarks
	е	xplosion, or rele	ease of		_		
		azardous waste on aste constituent		- Control of the Cont	<u></u>	Carineanan/e	
^	T.C.	equired, does the	, facility				
2.	have	the following e	quipment: 265.3	2			
	a.	Internal communi	cations or			NoT	required Near
	0.0	alarm systems?			<u>. </u>	Firz	STATION
	b.	Telephone or 2-w	ay radios		processor and	1/	
	-	at the scene of					
	C.	Portable fire ex					
		fire control, sp equipment and de					
		equipment?	Containing	<u>. V</u>		en-destructive-max	
	Ind	icate the volume	of water and/or	foam ava	ilable	for fi	re control:
		City of	Flint w	<u>a128</u>		<u>, , , , , , , , , , , , , , , , , , , </u>	
			_				
3.		ting and Maintena rgency Equipment:			•		
	a.	Has the owner or established test					
		maintenance pro	cedures	12			
		for emergency e	quipment?		ماده رسمی	Gently bertreme	**************************************
	b.	İs emergency eq					
		maintained in o condition?	perable	<u></u>		400 mining 4206	
А	li a c	· ounds on onesat	on provided				
4.	imr	s owner or operat nediate access to	internal			NaT	required, near fire
	ala	arms? (if needed) 265.34	man(A) means*	da diam	1,0,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
5.		there adequate a		1/			
	for	r unobstructed mo	vement?			4	
6.		s the owner or op					•
	to au	make arrangement thorities in case	s with local of an emergency	,			
		the facility?		<u>Y</u>			

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Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

Does the	Contingency g informatior	Plan contain 265.52	the
TULIOWILL	d intolmerior		

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

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			IE2 NO	14.7	Remarks
3.	Eme	rgency Coordinator 265.55			
	ã۰	Is the facility Emergency Coordinator identified?			
	. D.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>	***************************************	
	C.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	1		
4.	Eme	ergency Procedures 265.56			
	at Coc	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occdures listed in 265.56?			Noul have occurred

,	×.	``		**
				<i>2</i>
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Section G - JSURE AND POST CLOSURE (Part 26 Jubpart G) YES NO NI Remarks Closure 265.112 Is the facility closure plan available for inspection? Does the plan identify: maximum extent unclosed during facility life? ii. maximum hazardous waste inventory? endal estimated year of closure? iv. schedule of closure activities? Has closure begun? Post-Closure 265.118 Is the post-closure plan available for inspection? Does this plan contain: description of groundwater monitoring activities and frequencies? description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment name, address, and phone number iii. of person or office to contact

plies only to disposal facilities.

during post-closure care period?

Has the post-closure period begun?

Is the written post-closure cost estimate available? 265.144

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks
1 .	Are containers in good condition? 265.171			
2.	Are containers compatible with waste in them? 265.172	Northinamenta minimization		
3.	Are containers managed to prevent leaks? 265.173		t r	
4.	Are containers stored closed?	ercessionales emporationes	44r-teratronomenta	Warden Francisco
5.	Are containers inspected weekly for leaks and defects.	<u> </u>	45550Qq-timiquimity.	41-4-7-120-4-120-120-120-120-120-120-120-120-120-120
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	e ^{pper} likus kilobruda	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177		N/A	
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?		N <u>/A</u>	

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	S	ect	i	on	A:	Scope	9
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Complete this Appendix if the owner or operator of a TSD facility also generates
hazardous waste that is subsequently shipped off-site for treatment, storage,
or disposal.

Sect	ion E	3: MANIFEST REQUIREMENTS (Part 262, Subpart	B)			
			YES	МО	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40	<u>'</u>	<i></i>	and the second	
(2)	moni	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	(
(3)	fol' cop fest	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?	V		~ "	****
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	V		ς	
	c.	Name and EPA ID Number of Transporter(s)?	V		***************************************	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u> </u>		***************************************	
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?			·	· · · · · · · · · · · · · · · · · · ·
	f.	The total quantity of waste(s) and the type and number of containers loaded?	V	.,		
	g.	Required certification?	3/			
	h.	Required signatures?	V			
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility we ment. **Manual Company Comp	e gen	erato	r has	NOT received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26				

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